

1 ALLISON M. BROWN (Admitted Pro Hac Vice)
alli.brown@kirkland.com
2 JESSICA DAVIDSON (Admitted Pro Hac Vice)
jessica.davidson@kirkland.com
3 CHRISTOPHER D. COX (Admitted Pro Hac Vice)
christopher.cox@kirkland.com
4 **KIRKLAND & ELLIS LLP**
601 Lexington Avenue
5 New York, NY 10022
Telephone: (212) 446-4800

6
7 MICHAEL B. SHORTNACY (SBN: 277035)
mshortnacy@shb.com
8 **SHOOK, HARDY & BACON L.L.P.**
2121 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
9 Telephone: (424) 285-8330
Facsimile: (424) 204-9093

10 *Attorneys for Defendants*
11 UBER TECHNOLOGIES, INC.,
12 RASIER, LLC, and RASIER-CA, LLC

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16
17 IN RE: UBER TECHNOLOGIES, INC.,
18 PASSENGER SEXUAL ASSAULT
LITIGATION

19 This Document Relates to:

20 *WHBE 2149 v. Uber Technologies, Inc., et*
21 *al., No. 3:25-cv-05035-CRB*

22 *Jane Doe LS 608 v. Uber Technologies,*
23 *Inc., et al., No. 3:25-cv-05312-CRB*

24 *Jane Doe LS 609 v. Uber Technologies,*
25 *Inc., et al., No. 3:25-cv-05328-CRB*

26 *Jane Doe LS 610 v. Uber Technologies,*
27 *Inc., et al., No. 3:25-cv-05374-CRB*

28 *Jane Roe CL 178 v. Uber Technologies,*
Inc., et al., No. 3:25-cv-05537-CRB

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY REGARDING
PLAINTIFFS NOT IN COMPLIANCE
WITH THE COURT'S SEPTEMBER
16, 2025 ORDER [ECF 3921]**

Judge: Hon. Charles R. Breyer
Courtroom: 6-17th Floor

1 *Jane Roe CL 179 v. Uber Technologies,*
2 *Inc., et al., No. 3:25-cv-05538-CRB*

3 *E.M. 3681 v. Uber Technologies, Inc., et*
4 *al., No. 3:25-cv-05571-CRB*

5 *Jane Roe CL 182 v. Uber Technologies,*
6 *Inc., et al., No. 3:25-cv-05628-CRB*

7 *Jane Roe CL 181 v. Uber Technologies,*
8 *Inc., et al., No. 3:25-cv-05633-CRB*

DECLARATION OF MICHAEL B. SHORTNACY

I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Los Angeles, CA. I respectfully submit this declaration identifying the plaintiffs that are not in compliance with the Court's September 16, 2025 Order [ECF 3921].

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., attorneys of record for Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, "Uber"). I am a member in good standing of the Bar of the State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I know the following facts to be true of my own knowledge, and if called to testify, I could competently do so.

3. On September 16, 2025, the Court ordered each Plaintiff subject to Uber's Motion to Dismiss Cases for Failure to Comply with Court Order to provide a complete and verified Plaintiff Fact Sheet within 14 days of the Order. The Order therefore compelled compliance by each Plaintiff subject to the Order by September 30, 2025.

4. The Court also ordered counsel for Uber to submit a declaration within 21 days of the Order (*i.e.*, by October 7, 2025), identifying which, if any, Plaintiffs did not comply with the Court's Order.

5. On October 1, 2025, counsel for Uber reviewed MDL Centrality to determine which Plaintiffs subject to the Court's September 16, 2025, Order failed to provide a complete and verified Plaintiff Fact Sheet as ordered by the Court.

6. Based on counsel for Uber's review of MDL Centrality, as of October 1, 2025, the following Plaintiffs have failed to provide a Plaintiff Fact Sheet as ordered by the Court:

MDLC ID	Case Name	Case Number	Plaintiff Firm
3639	Jane Doe LS 608	3:25-cv-05312	Levin Simes, LLP
3640	Jane Doe LS 609	3:25-cv-05328	Levin Simes, LLP
3641	Jane Doe LS 610	3:25-cv-05374	Levin Simes, LLP
3678	Jane Roe CL 78	3:25-cv-05537	Cutter Law PC
3679	Jane Roe CL 79	3:25-cv-05538	Cutter Law PC

MDLC ID	Case Name	Case Number	Plaintiff Firm
3681	E.M. 3681	3:25-cv-05571	Cohen Hirsch, LP
3883	Jane Roe CL 182	3:25-cv-05628	Cutter Law PC
3884	Jane Roe CL 181	3:25-cv-05633	Cutter Law PC

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 1, 2025, in Los Angeles, California.

/s/Michael B. Shortnacy

Michael B. Shortnacy